




**TRANS PRIDE
INITIATIVE**

FILED

APR 16 2018

**In the United States District Court
For the Western District of Texas
Waco Division**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY 
DEPUTY CLERK

Juan Javier Ornelas
TDCJ # 1758617

Case No. W-18-CV-056

v.

Declaration of Nell Sylvia Gaither

Alexander Hamilton, et al.

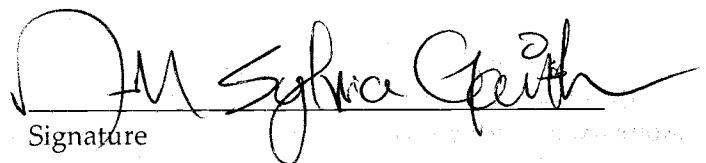
Declaration

Nell Sylvia Gaither hereby declares: That on or about May 17, 2017, Trans Pride Initiative received in our post office box a letter (postmarked May 15, 2017) from the plaintiff, a transgender woman whom we know by her affirming name of Juanita Ornelas. In that letter Ms. Ornelas stated that staff at the Eastham Unit Safe Prisons Department identified as Ms. L. Haynes, during conduct of an Offender Protection Investigation, reported to Ms. Ornelas that she could not identify any incarcerated person in the Texas Department of Criminal Justice (TDCJ) by the name of James Brown. Ms. Ornelas reports that she informed at a later date that a James Brown had been in the custody of TDCJ, but had been released.

On or about May 18, 2017, when responding to Ms. Ornelas' letter, Ms. Gaither accessed the TDCJ online "Offender Information Search" tool and searched the records for persons in TDCJ custody with the last name "Brown" and first name "James." Notes in Ms. Ornelas' file indicates the search returned 28 hits.

I declare under penalty of perjury that the foregoing is true and correct. Executed at 614 West Davis Street, Suite 208, Dallas, Texas 75208, on April 6, 2018.

Nell Sylvia Gaither
Name


Signature

In The United States District Court
For The Western District Of Texas
Waco Division

Juan Javier Ornelas

Case No.

TDCJ - CID #01758617

W-18-CV-056

v.

Alexander Hamilton

Certificate Of
Service

Certificate Of Service

I hereby certify that a copy of Nell Sylvia
Gaither's original Declaration has been served by
regular mail upon Defendant Alexander Hamilton at
his last known address P.O. Box 4003 Huntsville Tx.
77342, on the 12 day of April 2018.

Juan Javier Ornelas

Juan Javier Ornelas #01758617

Estelle (H.S.) Unit

264 FM 3478 Rd.

Huntsville Tx. 77320

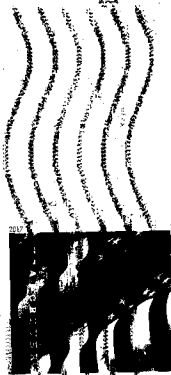
April 12, 2018

Juan Javier Ornelas #01758617
Estelle High Security Unit
264 FM 3478 Rd.
Huntsville Tx. 77320

Legal Mail
14-18-CV-056

NORTH HOUSTON TX 773

13 APR 2018 PM 9 L



U.S. District Clerk's Office
800 Franklin Ave., Rm. 380
Waco Tx. 76701

76701-153480

